

Douglas J. Pick, Esq.
Eric C. Zabicki, Esq.
PICK & ZABICKI, LLP
Counsel to Multicultural Radio Broadcasting, Inc.
369 Lexington Avenue, 12th Floor
New York, New York 10017
(212) 695-6000

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:
KOREAN RADIO BROADCASTING, INC.,

Involuntary Chapter 7

Case No. 19-46322 (ESS)

Alleged Debtor.
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PRESERVATION DEMAND DIRECTED TO ALLEGED DEBTOR

NOTICE IS HEREBY GIVEN that Multicultural Radio Broadcasting, Inc. ("MRB") intends to examine physical documents and digital (electronic) data in the possession of Korean Radio Broadcasting Inc. (the "Debtor"). Demand is therefore made that all physical documents, digital data, and all backup tapes or other archival media, in the possession of the Debtor be preserved for the duration of the pendency of this action or until examination of the same is made by MRB. The digital data that is required to be maintained includes (but is not limited to) the following: (i) word processing files, (ii) calendar program data, (iii) e-mails (with attachments) and .pst files, (iv) scanned document files; (v) computer logs; (vi) spreadsheets; (vii) data bases and financial/bank materials; (viii) audio and video files; (ix) text message logs; and (x) back-up or archival data.

NOTICE IS ALSO GIVEN that the digital files must be preserved regardless of the location of the device where such files reside, and regardless of whether such device is used for business or personal use, and should include (but not be limited to) any files located on (i) internal or external servers, (ii) desktop computers and/or network workstations, (iii) laptop computers, (iv) local hard drives, (v) personal digital assistants, (vi) mobile phones; (vii) iPods; (viii) voice mail or answering machines; (ix) caller-ID devices; (x) facsimile and/or scanner

devices; and/or (xi) back-up or archival devices or services (whether on or off-premises). Preservation should take the following forms: (i) backup and archival media should be segregated and secured; and (ii) mirror copies of all active network servers, desktop hard drives, laptop drives, personal digital assistant internal storage and/or SIM cards, mobile phone and iPod internal storage and/or SIM cards, voice-mail and answering machines storage, facsimile and/or scanner device storage, and caller-ID device storage should be made. If the Debtor is unwilling to incur the cost of producing such mirror copies, MRB will have such copies made by a forensic engineer and retained without disclosure to MRB's counsel until the mirror images are examined for privilege by counsel for the Debtor.

NOTICE IS ALSO GIVEN that this Preservation Demand applies to all magnetic, electronic or optical storage devices capable of storing data, including (but not limited to) floppy disks, hard drives, CD-ROMs, CD-Rs, CD-RWs, DVDs, Jazz and Zip disks, LS-120 superdisks, PCIM cards, magnetic tape drives, digital audio tapes, printer or memory buffers, compact flash cards, memory calculators, electronic dialers, electronic notebooks, personal digital assistants, smart cards, microfilm/microfiche, micro drives, memory sticks, minidisks, pen or thumb drives, flash drives, and/or Bernoulli drives.

NOTICE IS ALSO GIVEN that even if hard-copy versions of any of the digital data described above is available and/or produced, the preservation of all digital data (including metadata), and all backup or other archival media, is nonetheless required.

NOTICE IS ALSO GIVEN that you are requested to refrain from operating any personal computers (whether desktop or laptop) and/or any network workstations until an exact readable image is made of all the relevant electronic or digital information without altering, in any way, the original files.

NOTICE IS ALSO GIVEN that you are requested to disable or suspend any automatic or routine deletion procedures pursuant to any document retention policy or other procedure.

NOTICE IS ALSO GIVEN that you are required to preserve any electronic materials that have been logically deleted, but not physically erased, from any device.

NOTICE IS ALSO GIVEN that this Preservation Demand applies to all metadata (file system and embedded); legacy data; residual or ambient data; deleted data; data contained in unallocated, free or slack space; data in temp files; data in swap files; data in virtual memory; and data in any trails and/or logs (including network, audit, version and/or configuration trails or logs), all of which is required to be preserved.

NOTICE IS ALSO GIVEN that you are additionally required to preserve (i) any hard copy or digital materials necessary to understand or interpret any digital data, and (ii) any documentation, operating logs and/or reference manuals regarding the operation of any computer equipment, storage device or software used by you.

NOTICE IS ALSO GIVEN that this Preservation Demand is a continuing demand and requires preservation of electronic information created after the delivery of this Preservation Demand.

Dated: New York, New York
November 4, 2019

PICK & ZABICKI LLP
Counsel to Multicultural Radio
Broadcasting, Inc.

By: 

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